


UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

IN RE SUBPOENA DIRECTED TO)
EPSILON INVESTMENT MANAGEMENT) NO. _____
L.L.C.)

DECLARATION OF GEORGE RUDMAN IN SUPPORT OF
EPSILON INVESTMENT MANAGEMENT L.L.C.'S MOTION TO QUASH

Attached hereto is the original of the Declaration of George Rudman in Support of
Epsilon Investment Management L.L.C.'s Motion to Quash.

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Dated: May 15, 2006

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

TALISMAN CAPITAL TALON FUND,
LTD.

Plaintiff,

v.

RUDOLPH W. GUNNERMAN and
SULPHCO, INC.

Defendants.

NO. CV-N-0354-BES-RAM

DECLARATION OF GEORGE
RUDMAN IN SUPPORT OF EPSILON
INVESTMENT MANAGEMENT
L.L.C.'S MOTION TO QUASH

George Rudman, hereby affirms and declares as follows:

1. I am over the age of twenty-one years, am competent to testify in this matter, and have personal knowledge of the items set forth in this declaration.

2. I am the current Managing Director of Epsilon Investment Management L.L.C. ("Epsilon"), and I make this declaration in that capacity. I am based in Montreux, Switzerland.

3. I have been advised that Epsilon has been subpoenaed to produce documents in Wilmington, Delaware, and that a deposition has been noted in that jurisdiction. Epsilon is not a party to the referenced action.

DECLARATION OF GEORGE RUDMAN IN SUPPORT OF
EPSILON INVESTMENT MANAGEMENT L.L.C.'S
MOTION TO QUASH - 1
(CV-N-0354-BES-RAM)

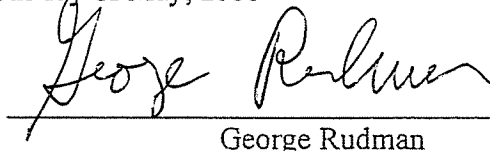
Smith & Hennessey
PLLC
Attorneys At Law
316 Occidental Avenue South Suite 500
Seattle, Washington 98104
(206) 292-1770

1 4. Epsilon maintains no offices and has no documents, books, or records in the
2 State of Delaware, or within a hundred miles thereof. Epsilon also has no management,
3 personnel, consultants, or employees in the State of Delaware or within a hundred miles
4 thereof. Epsilon's only presence in the State of Delaware or within a hundred miles of the state
5 is through its registered agent (National Registered Agents, Inc., in Dover, Delaware), required
6 as a function of Epsilon's registration as a limited liability company formed in Delaware.
7

8 5. Epsilon is an investment manager, with clients and holdings worldwide. To the
9 extent Epsilon conducts limited business in the United States, it does so through an office in
10 Boca Raton, Florida (7280 West Palmetto Park Road, Suite 310, Boca Raton, Florida 33433).
11

12 I declare the foregoing to be true and correct to the best of my knowledge and belief
13 under penalty of perjury under the laws of the State of Delaware and the United States.
14

15 SIGNED this 8th day of May, 2006.

16 
17 _____
18 George Rudman

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DECLARATION OF GEORGE RUDMAN IN SUPPORT OF
EPSILON INVESTMENT MANAGEMENT L.L.C.'S
MOTION TO QUASH - 2
(CV-N-0354-BES-RAM)

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CERTIFICATE OF SERVICE

I, Seth Reidenberg, hereby certify that on May 15, 2006 a copy of the foregoing document was caused to be filed and served pursuant to the District Court rules regarding filing procedures upon the following counsel of record:

Via Hand Delivery

Kurt Heyman, Esquire
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Via email

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